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Attorney for Plaintiff KEYHERRA GREEN

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

KEYHERRA GREEN,

Plaintiff,

vs.

LAS VEGAS METROPOLITAN POLICE
DEPARTMENT, a political subdivision of the State
of Nevada; FRED MERRICK; LORA CODY;
Defendants.

Case No. 2:20-cv-00769-KJD-DJA

STIPULATION AND ORDER TO ALLOW
PLAINTIFF TO FILE REVISED FOURTH
AMENDED COMPLAINT; FOR
DEFENDANTS TO ANSWER WITHIN
20 DAYS OF DATE ORDER GRANTING
THIS STIPULATION AND TO EXTEND
THE TIME FOR THE PARTIES TO FILE
DISPOSITIVE MOTIONS.

COMES NOW, Plaintiff, Keyherra Green, and Defendants, Las Vegas Metropolitan Police Department, Fred Merrick and Lora Cody, by and through their counsel of record (collectively, the “Parties”), and hereby stipulate as follows:

WHEREAS, on March 27, 2023, Plaintiff filed a motion for leave to file the fourth amended complaint (Dkt. 99) with a copy of the proposed pleading attached (Dkt. 99-1);

WHEREAS, on April 10, 2023, Defendants filed a response to the motion for leave (Dkt. 100), which raised issues with selected parts of the proposed pleading, while stating that it did not oppose other portions of the proposed pleading;

WHEREAS, the Parties’ attorneys have met and conferred to informally resolve the disputed issues, prior to the (extended) deadline for Plaintiff’s response in support of the motion;

1 IT IS HEREBY AGREED that the Parties shall resolve the disputed issues as follows, upon
2 the Court's entering them as an Order:

- 3 1. Plaintiff shall be granted leave the attached [Proposed] Fourth Amended Complaint
4 attached hereto as Exhibit A.
- 5 2. The Americans with Disabilities Act (ADA) claim and the DOE Defendants that were
6 included in prior pleadings (but not in the present pleading) shall be dismissed with
7 prejudice.
- 8 3. The caption is amended to remove parties that have been dismissed and all DOES.
- 9 4. Defendants shall file an Answer to the Fourth Amended Complaint within 20 days of
10 entry of this Order.
- 11 5. The deadline for dispositive motions shall be extended to August 7, 2023, so as to
12 accommodate the Parties' attorneys' schedules (regarding other matters and personal
13 matters).

14 DATED this 1ST day of May, 2023.

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PETER GOLDSTEIN LAW CORP

KAEMPFER CROWELL

By: /s/ Peter Goldstein
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Department, Fred Merrick and
Lora Cody

IT IS SO ORDERED

DATED this 1st day of May , 2023.



UNITED STATES DISTRICT COURT JUDGE